

## Phase I SAP Addendum

Below are DEQ's comments on the CFAC Phase I SAP Addendum

1. Page 5, Section 2.2.1, Surface Water Features. During a May 26, 2016 site visit, DEQ noted an un-named stream channel (see attached photo). Please include discussion of this surface water feature in the Phase I SAP Addendum. Provide any relevant information including potential or observed connection to the Cedar Creek Reservoir Overflow drainage ditch, observations regarding seasonal flow, and a description of any down gradient related wetland areas. Please include collection of surface water as well as sediment samples from this waterway and describe how sampling locations will be determined. Please also GPS the location of this stream channel and include its location and any pertinent features on future site maps.
2. Page 7, Section 2.2.1.3, Flathead River. DEQ notes that the streambank stabilization work project discussed could impact sediment and surface water samples collected along this area of the Flathead River, and thus call into question the usability of this information. Please include the location of the area impacted on a site figure, and describe the measures that will be taken to mitigate this potential impact on sediment samples and results.
3. Page 15, Section 2.2.4.4, Fueling Area. While the tanks themselves may be the responsibility of Calbag, this document should address how any potential contamination resulting from the tanks (i.e., from possible leaks or spills) will be identified. Please include a description of the sampling to be conducted to address this.
4. Page 19 and 20, Section 2.3.1, Historical Production Well Sampling. If the production wells are not going to be sampled, explain why the results have been provided? As it appears these wells will not be sampled or replaced, please explain how historical data from each of the existing production wells provides adequate data for site assessment. Include discussion of whether each of the locations can be adequately monitored using another existing well, or why future data from those areas is not needed.
5. Page 21, Section 2.4, first bullet. Please include the number that required clearing.
6. Page 22, Section 2.5.1, Drainage Structure Sampling. Please specify that the samples collected were soil samples. A number of drainage structures were not accessible for sample collection, particularly on the south side of Building 1. Please describe whether additional attempts will be made to access these points, or whether it is anticipated that downgradient borings or wells will provide information to characterize these areas. For example, CFDS-011 was not sampled, but the probe was covered in oil. Will a downgradient boring or well determine the characteristics of the material observed or whether it has migrated from the drainage structure?

7. Page 23, Section 2.5.2, Selection of Drainage Structure Drilling Locations. Please describe the criteria that were used to select the drilling locations.
8. Page 24, Section 2.6.1, Field Screening of Landfill Soil Gas. Last paragraph. Please specify, either in the text or on a figure, which probes were installed manually and which were installed using the geoprobe.
9. Page 24, Section 2.6.1, Field Screening of Landfill Soil Gas. Please provide a summary and evaluation of the results of the field screening and discuss whether the results suggest a need for further investigation in any specific locations.
10. Page 26, Section 2.6.2, Passive Soil Gas Sampling, last paragraph. This appears to refer to Section 3.2 rather than 3.3. Revise as appropriate.
11. Page 33, Section 3.5, Groundwater Sampling, last paragraph. See comment for Section 2.3.1 above and revise if appropriate to explain how the historical production well data will be used to support site characterization or whether installation of additional wells may be required.
12. Page 33, Section 3.6, Surface Water Sampling. See comment 1 above.
13. Page 34, Section 3.7, Sediment Sampling. See comment 1 above.
14. Figures: Indicate the un-named stream channel on all relevant figures (i.e. Figures 2, 3, 5, 7, etc.)